

1 Alison K. Hurley, State Bar No. 234042
ahurley@bremerwhyte.com
2 Tiffany L. Bacon, State Bar No. 292426
tbacon@bremerwhyte.com
3 BREMER WHYTE BROWN & O'MEARA LLP
20320 S.W. Birch Street
4 Second Floor
Newport Beach, California 92660
5 Telephone: (949) 221-1000
Facsimile: (949) 221-1001
6
7 Attorneys for Defendants,
FRANK FERRARA and CHARLIE FERRARA

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

11 CORY SPENCER, an individual; DIANA
12 MILENA REED, an individual; and
13 COASTAL PROTECTION RANGERS,
INC., a California non-profit public
benefit corporation.

14 Plaintiff,

15 | VS.

16 LUNADA BAY BOYS; THE
17 INDIVIDUAL MEMBERS OF THE
18 LUNADA BAY BOYS, including but not
19 limited to SANG LEE, BRANT
20 BLAKEMAN, ALAN JOHNSTON AKA
21 JALIAN JOHNSTON, MICHAEL RAE
PAPAYANS, ANGELO FERRARA,
FRANK FERRARA, CHARLIE
FERRARA; CITY OF PALOS VERDES
ESTATES; CHIEF OF POLICE JEFF
KEPLEY, in his representative capacity;
and DOES 1-10.

Defendants.

Case No. 2:16-cv-2129
Judge: Hon. S. James Otero
Dept: Courtroom 10C
Magistrate Judge:
Hon. Rozella A. Oliver

**DEFENDANT FRANK
FERRARA'S NOTICE OF
LODGING PROPOSED
JUDGMENT**

[Filed concurrently with Notice of Motion; Memorandum of Points and Authorities; Request for Judicial Notice of Adjudicative Facts; Declaration of Tiffany Bacon; Notices of Lodging; proposed Statement of Uncontroverted Facts and Conclusions of Law lodged herewith]

Date: August 21, 2017
Time: 10:00 a.m.
Dept: Courtroom 10C

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

1 **TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR
2 RESPECTIVE ATTORNEYS OF RECORD:**

3 PLEASE TAKE NOTICE that Defendant FRANK FERRARA ("Defendant"
4 or "Frank Ferrara") will and does hereby lodge the [Proposed] Judgment.

5 Dated: July 24, 2017

6 BREMER WHYTE BROWN & O'MEARA
7 LLP

8 By: 

9 Alison K. Hurley
Tiffany L. Bacon
10 Attorneys for Defendants
FRANK FERRARA and CHARLIE
FERRARA

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4 [Proposed] Judgment
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8
UNITED STATES DISTRICT COURT
9
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

10
11 CORY SPENCER, an individual; DIANA
MILENA REED, an individual; and
12 COASTAL PROTECTION RANGERS,
INC., a California non-profit public
13 benefit corporation,

14 Plaintiff,

15 vs.

16 LUNADA BAY BOYS; THE
INDIVIDUAL MEMBERS OF THE
17 LUNADA BAY BOYS, including but not
limited to SANG LEE, BRANT
BLAKEMAN, ALAN JOHNSTON AKA
JALIAN JOHNSTON, MICHAEL RAE
PAPAYANS, ANGELO FERRARA,
19 FRANK FERRARA, CHARLIE
FERRARA; CITY OF PALOS VERDES
ESTATES; CHIEF OF POLICE JEFF
KEPLEY, in his representative capacity;
21 and DOES 1-10,

22 Defendants.

} Case No. 2:16-cv-2129

} Judge: Hon. S. James Otero
Dept: Courtroom 10C

} Magistrate Judge:
Hon. Rozella A. Oliver

} [PROPOSED] JUDGMENT ON
FRANK FERRARA'S MOTION
FOR SUMMARY JUDGMENT OR,
IN THE ALTERNATIVE,
PARTIAL SUMMARY
JUDGMENT

} [Filed concurrently with Notice of
Motion; Memorandum of Points and
Authorities; Request for Judicial
Notice of Adjudicative Facts;
Declaration of Tiffany Bacon; Notices
of Lodging; proposed Statement of
Uncontroverted Facts and Conclusions
of Law lodged herewith]

} Date: August 21, 2017
Time: 10:00 a.m.
Dept: Courtroom 10C

25 Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

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27 Defendant FRANK FERRARA's ("Defendant" or "Frank Ferrara") Motion
28 for Summary Judgment against Plaintiffs, CORY SPENCER ("Plaintiff Spencer"),

1 DIANA MILENA REED (“Plaintiff Reed”) and COASTAL PROTECTION
2 RANGERS, INC. (“Plaintiff CPR”) (collectively, “Plaintiffs”), came for hearing on
3 August 21, 2017 at 10:00 a.m. in Courtroom 10C of the above-entitled Court.
4 Having considered the papers submitted in support of and in opposition to Frank
5 Ferrara’s Motion, and the oral arguments presented by counsel, the Court finds there
6 is no genuine dispute as to any material fact, and Frank Ferrara is entitled to
7 judgment as a matter of law on all of Plaintiffs’ claims, including Bane Act, Public
8 Nuisance, Assault, Battery, and Negligence, as Plaintiffs’ claims are without merit.
9 Frank Ferrara’s Motion for Summary Judgment is GRANTED.

10 IT IS FURTHER ORDERED:

11 _____
12 _____
13 _____.

14 **IT IS SO ORDERED.**

15 Dated: _____

16 Honorable S. James Otero
17 UNITED STATES DISTRICT COURT
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PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 20320 S.W. Birch Street, Second Floor, Newport Beach, California 92660.

On July 24, 2017, I served the within document(s) described as:

DEFENDANT FRANK FERRARA'S NOTICE OF LODGING PROPOSED JUDGMENT
on the interested parties in this action as stated on the attached mailing list.

(BY ELECTRONIC SERVICE) Complying with Code of Civil Procedure § 1010, I caused such document(s) to be Electronically Filed and Served through the _____ for the above-entitled case. Upon completion of transmission of said document(s), a filing receipt is issued to the filing party acknowledging receipt, filing and service by _____'s system. A copy of the [Email receipt System] filing receipt page will be maintained with the original document(s) in our office.

Executed on July 24, 2017, at Newport Beach, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Hailey Williams
(Type or print name)

Hailey Williams
(Signature)

1 **Cory Spencer v. Lunada Bay Boys et al.**

2 **Case No. 2:16-cv-2129-SJO**

3 **BWB&O CLIENT: Frank and Charlie Ferrara**
4 **BWB&O FILE NO.: 1178.176**

5 **SERVICE LIST**

6 7 8 9 10 11	Samantha Wolff, Esq. HANSON BRIDGETT 425 Market Street 26th Floor San Francisco, CA 94105 (415) 777-3200 (415) 541-9366 Fax Attorneys For PLAINTIFF swolff@hansonbridgett.com kfranklin@hansonbridgett.com	Tyson M. Shower, Esq. HANSON BRIDGETT 500 Capitol Mall Suite 1500 Sacramento, CA 95814 (916) 442-3333 (916) 442-2348 Fax Attorneys For PLAINTIFFS tshower@hansonbridgett.com	Victor Otten, Esq. OTTEN LAW, PC 3620 Pacific Coast Highway Suite 100 Torrance, CA 90505 (310) 378-8533 (310) 347-4225 Fax Attorneys For PLAINTIFFS vic@ottenlawpc.com
12 13 14 15 16 17 18 19	Jacob Song, Esq. KUTAK ROCK LLP 5 Park Plaza Suite 1500 Irvine, CA 92614 (949) 417-0999 (949) 417-5639 Attorney For CITY OF PALOS VERDES ESTATES and JEFF KEPLEY , in his representative capacity, serves as the Chief of Police Department of Defendant City of Palos Verdes Estates. jacob.song@kutakrock.com	J. Patrick Carey, Esq. LAW OFFICE OF PATRICK CAREY 1230 Rosecrans Avenue Suite 270 Manhattan Beach, CA 90266 (310) 526-2237 (310) 356-3671 Fax Attorney For ALAN JOHNSTON individual membeer of LUNADA BAY BOYS aka JALIAN JOHNSTON pat@patcareylaw.com	Aaron G. Miller, Esq. THE PHILIPS FIRM 800 Wilshire Boulevard Suite 1550 Los Angeles, CA 90017 (213) 244-9913 (213) 244-9915 Fax Attorneys For ANGELO FERRARA amiller@thephillipsfirm.com
20 21 22 23 24 25 26 27	Mark Fields, Esq. LAW OFFICES OF MARK C. FIELDS 333 So. Hope Street Suite 3500 Los Angeles, CA 90071 (213) 617-5225 (213) 629-2420 Fax Attorney For ANGELO FERRARA an individual member of LUNADA BAY BOYS and N.F. an individual member of LUNADA BAY BOYS fields@markfieldslaw.com	Peter R. Haven, Esq. HAVEN LAW 1230 Rosecrans Avenue Suite 300 Manhattan Beach, CA 90266 (310) 272-5353 (213) 477-2137 Fax Attorneys For MICHAEL RAY PAPAYANS peter@havenlaw.com	Dana Alden Fox, Esq. LEWIS BRISBOIS BISGAARD & SMITH, LLP 633 W. 5 th Street Site 4000 Los Angeles, CA 90071 (213) 580-3858 (213) 250-7900 Fax Attorneys For SANG LEE Dana.Fox@lewisbrisbois.com

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